October 31, the National Toxicology Program (NTP) published a notice requesting stakeholder input on a revised process for development and publication of the Report on Carcinogens (RoC).

 The previous (12th) RoC has proven to be very controversial and the changes in the process will be of great interest to a wide range of parties.

 One issue of particular concern to HSIA, which has participated in previous RoC listing decisions, is the continued downgrading of the role of the NTP Board of Scientific Counselors. At a time when NTP's listing decisions are attracting criticism from the scientific community and enhanced public scrutiny, this seems to be movement in the wrong direction.

 NTP's response to public comments in connection with the 12th RoC justifies downgrading the role of the Board of Scientific Counselors by characterizing the listing decision as one of policy as opposed to science. This seems wrong.

 The format of this meeting, as proposed and now underway, seems designed to avoid thoughtful consideration and discussion of these serious issues. A oneway discourse is likely only to serve as a rubber stamp to the proposed changes which further dilute the importance of the Board of Scientific Counselors in the listing process.

 There still needs to be a face-to-face meeting scheduled after the comments have been received and reviewed. To have any impact, it must be structured as a dialogue.

#### SUMMARY OF RG1,[1] RG2[2] AND NTP BOARD SUBCOMMITTEE[3] RECOMMENDATIONS FOR THE AGENTS, SUBSTANCES, MIXTURES OR EXPOSURE CIRCUMSTANCES REVIEWED IN 2000 FOR LISTING IN, DELISTING FROM, OR UPGRADING IN THE REPORT ON CARCINOGENS,[4] 10TH EDITION

Nominations/CAS No.	Primary uses or exposures	RG1 action	RG2 action	NTP board subcommittee action
Broad Spectrum UV Radiation (UVR) and UVA, and UVB, and UVC.  * *	Solar and artificial sources of ultraviolet radiation.  * *	Motion to list UVR as known to be a human carcinogen passed by unanimous vote (6/0).	Motion to list UVR as known to be a human carcinogen passed by unanimous vote (8/0).	Motion to list UVR as known to be a human carcinogen passed by unanimous vote (10/0).
			* *	

Source: 66 Fed. Reg. 13334-13337 (March 5, 2001)

<sup>[1]</sup> The NIEHS Review Committee for the Report on Carcinogens (RG1).

<sup>[2]</sup> The NTP Executive Committee (Agencies from the NTP Executive Committee represented on RG2 include: Agency for Toxic Substances and Disease Registry (ATSDR), Consumer Product Safety Commission (CPSC), Environmental Protection Agency (EPA), National Center for Envi-ronmental Health of the Centers for Disease Control and Prevention (NCEH/CDC), National Center for Toxicological Research of the Food and Drug Administration (NCTR/FDA), National Institute for Occupational Safety and Health Ad-ministration (OSHA), National Cancer Institute of the National Institutes of Health (NCI/NIH), and National Institute of Environmental Health Sciences/NIH(NIEHS/NIH) Interagency Working Group for the Report on Carcinogens (RG2).

<sup>[3]</sup> The NTP Board of Scientific Counselors Report on Carcinogens Subcommittee (the External Peer Review Group).

<sup>[4]</sup> RoC-Report on Carcinogens.